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EXECUTIVE SECRETARY

April 17, 2001

**By Hand**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Complaint by AT&T Regarding the Delivery of Calling Name Services by BellSouth  
Telecommunications, Inc.

Docket No. 00-00971

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of AT&T's Response to  
BellSouth's Petition for Appeal from Initial Order of Hearing Officer.

If you have questions, please call me.

Sincerely,

  
Jim Lamoureux

Encls.

cc: Guy Hicks

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In re:	)	
	)	
Complaint by AT&T Regarding the	)	
Delivery of Calling Name Services by	)	Docket No. 00-00971
BellSouth Telecommunications, Inc.	)	
	)	

**AT&T'S RESPONSE TO BELL SOUTH'S  
PETITION FOR APPEAL FROM  
INITIAL ORDER OF HEARING OFFICER**

AT&T estimates that BellSouth has now spent at least 100 times more effort and time drafting, filing, and arguing pleadings in this case than it took to manually load all of the information for the 2 customers requested by AT&T. Moreover, AT&T understands that BellSouth has now completed its efforts to allow for 10 digit translations in Tennessee. All in all, BellSouth's protestations notwithstanding, it would appear that the issue of manual loading customer information is moot in Tennessee. Nonetheless, given the tone and accusations in BellSouth's Petition for Appeal, AT&T feels compelled to respond. Accordingly, and pursuant to the letter issued by the Authority on April 9, 2001, AT&T hereby responds to BellSouth's Petition for Appeal from the Initial Order of the Hearing Officer.

First, BellSouth's accusation that AT&T "exaggerated the effort required to implement the mechanized solution" must be addressed. At the Agenda Conference, counsel for AT&T tried to clarify that by "computer system" AT&T did not mean to claim in its Petition that AT&T would have to build or purchase new computers. By clarifying the use of the term "computer system," however, counsel for AT&T did not in any sense mean to agree that the claim in its Petition was "exaggerated." Counsel for AT&T agrees that use of the phrase "computer system" was inartful or

“loose.” The actual effort required by AT&T to “avail itself” of the mechanized solution “offered” by BellSouth is described in one of the exhibits to BellSouth’s Petition for Appeal:

In order to access the BellSouth database, AT&T and BellSouth would be required to upgrade the CONNECT:DIRECT interface between the two companies. AT&T also would also be required to build an interface to enable us to communicate with BellSouth’s CNAM database.

*January 17, 2001, letter from Denise Berger of AT&T to Jan Burriss of BellSouth, Exhibit D to BellSouth’s Petition for Appeal.* It is this effort that AT&T endeavored to describe succinctly in its Petition and tried to clarify at the Agenda Conference. The bottom line, however, is that, regardless of the description of the effort, AT&T would have had to incur substantial cost to “avail itself” of the mechanized solution that BellSouth tried to force AT&T to use, and which would have been temporary. That is why AT&T informed BellSouth that AT&T would not use the mechanized solution.

BellSouth also alleges that the situation described by AT&T in its Petition was not an emergency and that AT&T somehow used that situation to “goad” the Authority into immediate action. That is simply not true. AT&T does not use the regulatory process in the cavalier manner suggested by BellSouth, and certainly does not request relief from the Authority without good cause. The situation was an emergency in that AT&T faced the very real and very immediate prospect of losing a customer with no solution in sight other than requiring BellSouth to manually load the customer information into its database.

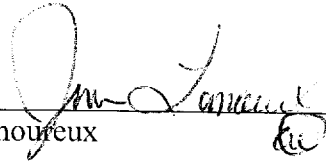
In retrospect, there now appears to be a problem that is preventing the transmission of that information. That problem, however, does not change the nature of the emergency at the time AT&T filed its Petition. At that time, no problem was evident, and it would not have come to light had BellSouth not spent the 60 seconds or so (at most) to manually load the customer information as requested by AT&T. AT&T has agreed with BellSouth that BellSouth fulfilled its agreement to

manually load the information. Any subsequent failure in the transmission of that information caused by AT&T or the customer is AT&T's responsibility, and AT&T does not suggest that BellSouth is or should be responsible for any such failures. Nor would AT&T request relief from the Authority for any such failures.

The fact remains that, at the time AT&T filed its Petition, AT&T faced the very possibility of losing a customer unless BellSouth manually loaded the requested customer information into its database. It is that prospect of losing a customer that prompted AT&T to request emergency relief from the Authority, and that prospect is not in any way altered by the after the fact discovery of some other problem impeding the transmission of the customer information from BellSouth's database.

The remainder of BellSouth's Petition is a rehash of the arguments already raised by BellSouth in this proceeding to justify its initial recalcitrance to implementing 10-digit global translation, or any other solution that allows CLEC customer names to appear in the displays of BellSouth customers who subscribe to Caller ID Deluxe. AT&T has already addressed these issues in prior filings and will not repeat its arguments here, other than to say that the Hearing Officer and the Authority are well within their authority under both federal *and* state law (particularly T.C.A. § 65-4-124(a)) in requiring BellSouth to implement 10-digit global translation and the manual process ordered by the Hearing Officer. It is particularly telling that nowhere in its Petition for Appeal does BellSouth ever address Tennessee law.

Respectfully submitted,



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The South Central States, Inc.

Dated: April 17, 2001